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September 12, 2018

Via ECF:

Honorable P. Kevin Castel, U.S.D.J.
United States District Court for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: 1:18-cv-05622-PKC Humane Consumer LLC v. COB Ecommerce Empire LLC
et al.

Dear Judge Castel:

We represent Plaintiffs in this matter and have appeared for COB Commerce Empire LLC and Charles Crawford (“COB Defendants”). In the joint letter to the Court dated August 30, 2018, in anticipation of the September 6 initial conference, we advised that “Counsel for COB Defendants has agreed to accept service of process by mail, while reserving all rights, and **Counsel for Plaintiff has agreed to extend the deadline for COB Defendants to respond to the Complaint to October 1, 2018. It is respectfully requested that the Court grant and/or so-order this extension of time for COB Defendants to respond to the complaint. No such requests have been previously made.**” (emphasis added)

Since the initial conference was adjourned to November 2, we were unable to address the extension at the conference. Your Honor’s individual practices indicate such a request is made by letter, so we would ask that this extension of time to respond to the complaint be “so ordered.”

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I also note that I will be in Portugal on business on November first, and either flying back November 2 or November 3, so would request that the initial conference be either November 5 or November 8 or 9.

Respectfully submitted,

s/Steven M. Richman/

Cc: Paul Siegert, Esq. (via ECF)
Boris Brownstein, Esq. (via ECF)